

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND  
GREENBELT DIVISION**

UNITED STATES,	:	
	:	
v.	:	Case No.: 8:23-cr-00311 (PX)
	:	
DAJUAN TAYLOR	:	Hearing: November 22, 2024, at 9:00 a.m.
	:	
	:	

**CONSENT MOTION FOR PRETRIAL RELEASE ON CONDITIONS**

COMES NOW Dajuan Taylor, by counsel, with the consent of the Government, and pursuant to 18 U.S.C. § 3142, to respectfully move this Honorable Court for pre-trial release on conditions, as set forth below.

Please take notice that Mr. Taylor and the Government, through counsel, respectfully ask that this matter be set for a hearing on November 22, 2024, at 9:00 a.m., or as soon thereafter as counsel may be heard.

In support, Mr. Taylor states as follows:

1. On September 4, 2024, Mr. Taylor appeared before this Court with undersigned counsel and agreed to temporary detention while arrangements could be made for pretrial release and supervision.
2. At the September 4, 2024, USPO Irma Dasovic recommended pre-trial release with Mr. Taylor's mother serving as third-party custodian, and her position remains consistent with that recommendation.
3. While Mr. Taylor has been incarcerated at the Chesapeake Detention Facility since September 5, 2024, undersigned counsel and counsel for the Government have communicated and agree the following conditions for pretrial release are appropriate:

- a. Third-party custodian: Mr. Taylor's mother, Carmelita Xanders;
- b. Residence: Ms. Xanders's home in Fredericksburg, Virginia;
- c. Electronic monitoring;
- d. Random drug testing;
- e. Restrictions on internet access;
- f. Other standard conditions as required by the Court.

WHEREFORE, Mr. Taylor, by undersigned counsel, and with the consent of the Government, respectfully moves this Honorable Court to order Mr. Taylor be released on pre-trial supervision with the conditions outlined above.

Date: November 18, 2024

Respectfully submitted,

Dajuan Taylor, *by counsel*

/s/  
Daniel H. Goldman, VSB # 82144  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of November, 2024, I will electronically file the foregoing Motion with the Clerk of Court using the CM/ECF system, which will provide service to all parties.

/s/  
Daniel H. Goldman